

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

In Re: * **Chapter 11**
*
American Resources Staffing Network, Inc. * **Case No. 14-11527-BAH**
American Resource Network, Inc., * **Case No. 14-11529-BAH**
*
* **(Jointly Administered)**
*
Debtor(s) * **Hearing Date: None, Unless**
***** **Required by Court**

CHAPTER 11 DEBTOR-IN-POSSESSION'S ASSENTED-TO EX-PARTE MOTION TO
CONTINUE HEARING ON MOTION TO APPOINT TRUSTEE

NOW COME the Jointly Administered Chapter 11 Debtors-in-Possession ("Debtors" or "ARSN" or "ARN"), by their attorneys Cleveland, Waters & Bass, PA, and request that this Court, on an ex-parte basis, continue the hearing on the U.S. Trustee's Motion to Appoint a Trustee (Doc. #64 on the Docket) from December 17, 2014 at 2:00 p.m. to January 7, 2015 at 11:00 a.m., a date and time when there is already another matter pending before the Court (the Examiner's fees). In support of their Motion, the Debtors state as follows:

1. Debtors each filed a voluntary petition under title 11 Chapter 11 of the United States Code on July 31, 2014 ("the Petition Date"). Shortly thereafter the Court granted joint administration. Since the Petition Date the Debtors have continued to operate their business and manage their property as debtors-in-possession pursuant to §1107 and §1108 of the Bankruptcy Code. No creditors committee has been appointed in this case. ARSN operates a large regional temporary staffing business and ARN is ARSN's management company.

2. On December 15th, two days ago, the Court approved ARSN's Motion to Sell Substantially All of its Assets to Wicked Staffing Solutions, LLC (See Order dated 12/15/14 at

Doc. #191 on the Docket) (“the Sale Order”). Under the Sale Order the parties have until December 31, 2014 to close (and in fact are trying to close by the end of this week), and the Debtors are supposed to file a liquidating plan on or before February 6, 2015.

3. The Debtors requested that the U.S. Trustee’s Motion for a Trustee (which has been pending for some time) be continued at least until after the sale contemplated by the Sale Order can occur. Otherwise, the sale process might be delayed or derailed, and/or the Motion for a Trustee may become moot. The UST consented to a short continuance to January 7, 2015 at 11:00 a.m., when this case is already in front of the Court on the Examiner’s fees.

4. Since the UST consents, there will be no prejudice to any party in granting this Motion.

WHEREFORE, the Debtors respectfully requests this Court:

A. Grant this Motion and continue the hearing on the UST’s Motion for a Trustee (Doc. #64 on the Docket) to January 7, 2015 at 11:00 a.m.; and

B. Grant such other and further relief as this Court deems just and equitable.

Respectfully Submitted,

American Resource Staffing Network, Inc.,
American Resource Network, Inc.
Chapter 11 Debtors-in-Possession
By their attorneys,
Cleveland, Waters & Bass, PA

Dated: December 17, 2014

By: /s/ Deborah A. Notinger
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CERTIFICATE OF SERVICE

I, Steven M. Notinger, certify that I have as of this date served the above Motion on the following parties by CM/ECF, including the U.S. Trustee:

Via CM/ECF to the following parties:

Eleanor Wm Dahir on behalf of Interested Party Wicked Staffing, LLC
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Peter N. Tamposi on behalf of Creditor State Garden, Inc.
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Dated: December 17, 2014

By: /s/ Deborah A. Notinger
Deborah A Notinger (#02013)